

FILED

2019 MAY 13 AM 11:24

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

1:19 MC 75

IN RE: SEIZURE OF

Misc. Case No.

\$182,292.42 in Funds seized from JP)
 Morgan Chase Bank Account #xxxxx2361)
 in the name of Flores Flooring, LLC; and)
 \$6,402.40 in Funds seized from JP)
 Morgan Chase Bank Account #xxxxx2174)
 in the name of Francisco A. Flores)
)
)
)

JUDGE

JUDGE LIOI

STIPULATION TO EXTEND TIME
FOR THE UNITED STATES TO
FILE A JUDICIAL COMPLAINT IN
FORFEITURE

The parties to the above-referenced matter, the United States of America and Potential Claimant Francisco Flores (hereinafter collectively referred to as the "Parties"), each by undersigned counsel/authorized representative, agree as follows:

1. The above-captioned assets, \$182,292.42 in Funds seized from JP Morgan Chase Bank Account #xxxxx2361 in the name of Flores Flooring, LLC and \$6,402.40 in Funds seized from JP Morgan Chase Bank Account #xxxxx2174 (hereinafter referred to as "the Seized Accounts"), was seized by the Federal Bureau of Investigation on November 13, 2018, pursuant to a seizure warrant issued by Magistrate Judge Jonathan D. Greenberg.
2. On February 12, 2019, Francisco Flores filed a valid claim in the administrative forfeiture proceeding pursuant to 18 U.S.C. § 983(a)(2), which triggers the 90 day time period within which the government must file a civil forfeiture action or a criminal indictment naming the seized property in a forfeiture specification. No other claims have been filed as of this date contesting the seizure or forfeiture of the seized account.
3. Under 18 U.S.C. § 983(a)(3)(A), the United States must file a judicial complaint in forfeiture against a seized asset not later than 90 days after a valid administrative claim for the seized asset is filed. However, 18 U.S.C. § 983(a)(3)(A) also provides that a court may extend the period for filing a complaint for good cause shown or upon agreement of the parties.
4. Pursuant to 18 U.S.C. § 983(a)(3)(A), and absent an extension of time, the deadline for the United States to file a judicial complaint in forfeiture with respect to the seized account is May 13, 2019.
- 5.. The Parties represent that the only known potential claimant to the seized account is Francisco Flores. Jason Lorenzon, Esq. represents Francisco Flores.

STIPULATION TO EXTEND TIME FOR THE UNITED STATES TO FILE A JUDICIAL
COMPLAINT IN FORFEITURE (Cont.)

6. The Parties are engaged in negotiations in a criminal investigation related to the seizure of the above-captioned bank accounts and need additional time to discuss a possible resolution of the case. Accordingly, the Parties wish to extend the time for the United States to file a judicial complaint in forfeiture against the seized account by 60 days, from May 13, 2019 to July 12, 2019.

7. The persons signing this Stipulation to Extend Time warrant and represent that they possess full authority to bind the persons or entities on whose behalf they are signing and that they are unaware of any other potential claimants to the seized account.

8. With respect to the seized account, the Parties agree to an extension of the period for filing a judicial complaint in forfeiture until **July 12, 2019**.

Jason T. Lorenzon, Esq.
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(216) 573-3722

Attorney for Francisco Flores

Executed this 13rd day of May, 2019.

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Attorney for the United States

IT IS SO ORDERED:

Executed this 13th day of May, 2019.

United States District Court Judge

May 15, 2019